

Francis E. Chin  
Sr. Legal Counsel  
Regulatory/HSE



**WASTE MANAGEMENT**

1001 Fannin, Ste 4000  
Houston, TX 77002  
(713) 328-7187  
(713) 287-2654 Fax

November 28, 2011

US EPA RECORDS CENTER REGION 5



421540

Via Certified Mail/Return Receipt Requested

Marsha A. Adams  
Enforcement Specialist  
Enforcement Services Section 2  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: Chemetco Facility  
Waste Management of Illinois, Inc.'s (Metro East) Supplemental Response to U.S.  
Environmental Protection Agency's Request for Information Pursuant to Section 104(e)  
of CERCLA Dated March 21, 2011

Dear Ms. Adams:

Please find enclosed Waste Management of Illinois, Inc.'s (Metro East) supplemental response to the above-referenced U.S. Environmental Protection Agency information request dated March 21, 2011.

Please do not hesitate to contact me at (713) 328-7187, if you have any questions.

Best regards,

A handwritten signature in black ink, appearing to be "Francis Chin". The signature is written over a horizontal line.

Francis Chin  
Sr. Legal Counsel, Regulatory/HSE  
On Behalf of Waste Management of Illinois, Inc. (Metro East)

Enclosures

cc: Thomas Martin, Esq.

RECEIVED DEC 05 2011 *gcl*

*From everyday collection to environmental protection, Think Green® Think Waste Management.*

### **GENERAL OBJECTION TO QUESTIONS**

Respondent also objects to the following questions to the extent they request information protected by the attorney-client privilege or the attorney work product doctrine.

It should also be noted that these questions seek information regarding the Chemetco facility (the "Site") from 1969 to 2001. Therefore, knowledge and documents regarding operations at this Site are minimal.

Without waving any rights, claims, defenses, objections, or privileges, Waste Management of Illinois, Inc. (Metro East) or any of its affiliates, officers, directors, or employees may have, Waste Management of Illinois, Inc. (Metro East) responds to EPA based upon information currently available to it. Waste Management of Illinois, Inc. (Metro East) retains the right to supplement its answers to these questions if, and when, more information becomes available in the future.

## **INFORMATION REQUEST**

7. State whether an insurance policy has ever been in effect which may [indemnify] your Company against any liability, which the Company may have under CERCLA for any release or threatened release of a hazardous substance that may have occurred at the Site. If so, please provide a copy of the policy. Identify any policy that you cannot locate or obtain by the name of the carrier, year s in effect, nature and extent of coverage, and any other information you have.

**Response:** None.

10. Identify the person who selected the Site as the location to which you took the materials.

**Response:** Upon information and belief, the customer selected the Site as the location where material would be transported.

11. Describe the measures taken by each person or company who gave the materials to you to transport to the Site to control how you would handle the materials in their transport to the Site.

**Response:** None.

12. For each material taken to the Site, describe any warnings or instructions given to you with respect to its handling.

**Response:** None.

15. Describe what was done to each type of material after it was taken to the Site.
- vii. Describe all procedures for paying for the disposal/placement of materials at the Site, including but not limited to:
- a) method of payment (e.g., cash, check, money order;
  - b) the frequency of which those payments were made;
  - c) to whom those payments were made;
  - d) the total amount of those payments and the rates paid;
  - e) where those payments were made (e.g., at the Site, sent in mail, etc.); and
  - f) provide the identity of the employee/agent in charge of accounting for and making such payments.

**Response:**

vii. In Respondent's Response dated October 14, 2011, Respondent misunderstood the Request below. Based upon information and belief, Respondent responds as follows:

- a). Checks.
- b). Currently unknown to Respondent.
- c). Currently unknown to Respondent.
- d). Currently unknown to Respondent.
- e). Currently unknown to Respondent
- f). Don Weber  
Former Controller, prior to 1980-1997  
Current whereabouts unknown to Respondent.